

REMARKS


In response to the arguments set forth in the Response to Arguments, a number of statements are made. If we assume that those statements are generally correct, it is still not believed that a *prima facie* rejection is made out.

A good example is the statement on page 5. Suppose it were true that "As shown above, Youn discloses estimating motion vectors, using a localized search (within window S) to avoid degradation due to quantization errors, as the signal moves through the transcoder and gets processed (A/D, D/A)." Except for the last part of this statement, even if it were true, it would not make out a *prima facie* rejection. That is because quantization errors have nothing to do with A/D or D/A conversion. The last part of the clause where D/A and A/D conversion is simply inserted is simply argument and there is no basis within the reference. The reference is talking about motion estimation, which is encoding. Therefore, there is no discussion whatsoever of trying to reduce errors due to analog-to-digital and digital-to-analog conversion during decoding. The rejection simply does not work and should be reconsidered. The fact that a reduced window might or might not be used to reduce quantization errors during encoding has nothing to do with a decoder that reduces errors caused by D/A and A/D conversion during decoding.

Quantization errors are the result of encoding, not decoding. Therefore, reconsideration is requested.

Respectfully submitted,

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